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COMMONWEALTH OF KENTUCKY

NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET

DEPARTMENT FOR ENVIRONMENTAL PROTECTION

FRANKFORT OFFICE PARK 18 REILLY ROAD FRANKFORT, KENTUCKY 40601

March 16, 1992

Mr. Harold Taylor, Chief Kentucky/Tennessee Unit US EPA - Region IV 345 Courtland Street, NE Atlanta, Georgia 30365

Re: Proposed Delisting of Lees Lane Landfill NPL Site, Jefferson County

Dear Mr. Taylor:

While the Division of Waste Management will not oppose the delisting of the Lees Lane site, we would like to renew our concern about the lack of remediation achieved at the site. The remedy selected primarily provided only for bank stabilization, a gas collection system to prevent migration to adjacent homes, and limited removal at selected "hot spots".

The division believes the scope of waste disposal activities at the site was never fully characterized. Drilling at the site never established the exact depths of waste contained in this former sand and gravel quarry. Significant amounts of hazardous waste remain on the site and have not been addressed by the remedy implemented by EPA.

Contamination is likely being released to the groundwater and to the Ohio River every day. Surface contamination likely exists at the site which has also remained unaddressed. The division recently responded to an emergency concerning drums of unknown substances at the site. The division discovered and paid for the removal of drums of hazardous waste which were apparently left from the original disposal activities but never addressed by the remedy.

We offer these comments in the spirit of cooperation and assure you that we will continue to coordinate during the Operations and Maintenance phase of the remediation.

Sincerely,

Caroline P. Haight, Acting Director

Division of Waste Management